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District of Nevada
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LISA KEITH,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01110-JAD-VCF

**JOINT STIPULATION FOR EXTENSION OF
TIME AND ORDER
(First Request)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from November 13, 2018 to **December 13, 2018**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel has been experiencing chronic migraines for over a week, which impairs her vision. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until late December. Counsel also has a Ninth Circuit brief due this week, which requires multiple levels of review. Due to Counsel's unanticipated leave and heavy workload, Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's

1 Motion for Summary Judgment. Defendant makes this request in good faith with no intention to
2 unduly delay the proceedings. The parties further stipulate that the Court's Scheduling Order shall be
3 modified accordingly.
4

5 Respectfully submitted,

6 Dated: November 13, 2018

/s/ Cyrus Safa
(*as authorized by email on November 13, 2018)
CYRUS SAFA
Attorney for Plaintiff

DAYLE ELIESON
United States Attorney

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney

13 **APPROVED AND SO ORDERED:**
14

15
16 DATED: November 13, 2018



THE HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED] ORDER**
4 on the date and via the method of service identified below:

5 **CM/ECF:**

6
7 Cyrus Safa
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21 Attorneys for Plaintiff

22
23 Respectfully submitted this 13th day of November 2018,

24 /s/ Tina L. Naicker
25 TINA L. NAICKER
26 Special Assistant United States Attorney